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11 VIOLET BLUE

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

19 VIOLET BLUE, an Individual,
20 Plaintiff and counter-
21 defendant,
22 v.
23 ADA MAE JOHNSON a/k/a ADA
24 WOOFINDEN, an individual d/b/a
25 VIOLET BLUE a/k/a VIOLET a/k/a
26 VIOLET LUST; et al.,
27 Defendants and
28 counterclaimants.

Case No. C 07-5370 SI

**DECLARATION OF JILL TANNER IN
SUPPORT OF PLAINTIFF BLUE'S
MOTION FOR PRELIMINARY
INJUNCTION**

Hon. Judge Illston
Courtroom 10, 19th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

**Hearing Date: May 9, 2008
Hearing Time: 9:00 a.m.**

Case No. C 07-5370 SI

1 I, Jill Tanner, declare as follows:

2 1. My name is Jill Tanner and I am the president and owner of the California
3 Corporation Violet Blue, Inc. I am third party to this litigation. I have personal knowledge of the
4 facts in this declaration unless otherwise stated, and could and would competently testify to them
5 if called as a witness.

6 2. In late October 2006, I learned that the defendant in this action, Ada Mae Johnson
7 (who I understand is referred to now as "Ada Woffinden"), or someone else acting in concert
8 with her, had falsely named my company as the registrant of the domain name
9 "www.violetblue.org" by providing to the domain name registrar the name "Violet Blue, Inc." as
10 contact information for the registrant. Attached to this declaration as Exhibit **A** is a true and
11 correct copy of the "whois" registry information which erroneously identifies Violet Blue Inc. as
12 the "Registrant Name" and "Admin Name" for the website www.violetblue.org.

13 3. I learned about this fraudulent registration after having been served with the
14 complaint in this action, Blue v. Johnson et al. (Case No. 07-5370). Violet Blue, Inc., was named
15 in the original complaint and described as the owner of the website, www.violetblue.org, and as
16 one purportedly having control over the content at that site. Violet Blue, Inc. has been
17 subsequently dismissed from this action.

18 4. I have never given Ms. Woffinden or anyone else permission to register, in my or
19 my company's name, a domain name containing "violetblue".

20 5. I was shocked to learn that Ms. Woffinden had used my company for registering a
21 website that deals with hardcore pornographic content. I feared that this might damage my
22 reputation, and that of my company, by having been erroneously linked to such sexually explicit
23 content and having had to respond to the litigation pending against my company. As a result, I
24 instructed my attorney, Paul M. Miloknay, to send a cease and desist letter to Ms. Woffinden's
25 attention immediately. A true and correct copy of that letter, dated October 31, 2007, is attached
26 to this declaration as Exhibit **B**.

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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed this 27th day of April, 2008, at San Francisco,
3 California.

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5 Jill Tanner
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